149 REC'D SEP 08 2010 APCO

VIA CERTIFIED MAIL

(Return Receipt Requested)

August 30, 2010

Ms. Rebecca Webber Director, Air and Waste Management Division U.S. Environmental Protection Agency 901 N. 5th Street, Kansas City, KS 66101

Mr. James Kavanaugh, Director Air Pollution Control Program Missouri Department of Natural Resources PO Box 176 Jefferson City, MO 65102

RE:

NESHAP Initial Notification

Kennett Generating Plant

0063

NAICS Code: 221112

Dear Ms. Webber and Mr. Kavanaugh:

On March 3, 2010, the United States Environmental Protection Agency adopted final amendments to the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63 Subpart ZZZZ. These amendments were effective on May 3, 2010. Pursuant to Section 63.6645(a) and Section 63.9(b), City Light Gas and Water/Kennett Board of Public Works submits the following information as its Initial Notification:

- Name and address of the owner/operator: City Light Gas and Water
 P.O. Box 40
 303 South Anthony Street
 Kennett, MO 63957
- Address of the affected source (i.e. the physical location of the engine(s) subject to Subpart ZZZZ):
 Kennett Generating Plant
 401 South Anthony Street
 Kennett, MO 63857

Ms. Rebecca Webber Mr. James Kavanaugh August 30, 2010 Page 2

- 3. Identification of the relevant standard and compliance date: Subpart ZZZZ standards for existing RICE at area sources and May 3, 2013.
- 4. Description of the affected source:

Designation	Make	Model	Horsepower
Unit #8	Nordberg	FSG-1316-HSC	4290HP
Unit #9	Nordberg	TSGL-2112-SC	8725HP
Unit #10	Nordberg	TSGL-2112-SC	8725HP
Unit #11	Nordberg	TSGL-2112-SC	8725HP

- 5. Types of HAPs emitted by affected source: Benzene, toluene, xylenes, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, some polycyclic aromatic hydrocarbons and other trace organic compounds.
- 6. Major or Area Source: Area.

City Light Gas and Water plans to operate RICE at the facility that are exclusively used for emergencies and meet the definitions outlined in 40 C.F.R. Part 63 Subpart ZZZZ. These RICE are not subject to emission controls but are listed below for purpose of reference:

Designation	Make	Model	Horsepower
Unit #1	Fairbanks-Morris	33F12	500HP
Unit #2	Fairbanks-Morris	33F12	500HP
Unit #3	Fairbanks-Morris	33F16	1100HP
Unit #4	Fairbanks-Morris	31AD18	2000HP
Unit #5	Fairbanks-Morris	33F16	1900HP
Unit#6	Fairbanks-Morris	31AD18	2700HP
Unit#7	Fairbanks-Morris	31AD18	3400HP

If you have any questions regarding the above, please do not hesitate to contact David Wilkins, Director of Operations by e-mail at dwilkins@clgw.net, phone 573-888-5366 or by mail at:

Kennett Board of Public Works

Attn: David Wilkins

P.O. Box 40

303 South Anthony Street

Kennett, MO 63857

Ms. Rebecca Webber Mr. James Kavanaugh August 30, 2010 Page 3

Sincerely,

David W. Wilkins, Director of Operations

David W. Williams

City Light Gas and Water

Kennett, MO